CENTRAL INTELLIGENCE AGENCY WASHINGTON, D.C. 20505

The Honorable James T. McIntyre Director Office of Management and Budget Washington, D.C. 20503

Dear Mr. McIntyre:

This Agency appreciates the opportunity to respond to your memorandum of April 6, 1979, requesting our comments on the draft OMB circular on employee parking fees in the general sense and in particular, as this circular will affect the Agency. As you are aware, we have for years participated in an active program organizing and operating carpools by offering premium parking to participating employees. We clearly recognize the value of the program and will continue vigorous support.

The intent of the circular is clearly directed to energy conservation and is not established as a revenue source. As such, this Agency takes exception to parking fees when no viable alternative to privately owned vehicles exists. This Agendy has the majority of its employees assigned to facilities in the outlying areas where there is no adequate public transportation. In addition, dispersed living areas and requirements for extended work days, particularly during periods of crisis, and shift work make it impossible for a significant humber of personnel to utilize carpools. Further, a large humber of our employees are under cover and, as such, ate prohibited from using public transportation or mixed carpools to known CIA facilities. In effect, the parking fee for most of these personnel becomes a punitive action because of circumstances beyond their control. While we endorse parking fees where applicable in densely populated urban areas served by suitable public transportation,/exception should be established for lightly populated subyrban areas and in particular to those facilities, of this Agency where significant numbers of employees fall within the situation described above.

I would add that this Agency must take exception with the statement that an agency can administer the collection

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and management of the fee structure within current manpower ceilings. In today's tight budgetary ceilings, the
additional work can only be absorbed by reducing other
essential activity. Because of security and cover considerations, this Agency will be forced to operate the
administration internally. Attempting to maintain a
cleared commercial parking management team is not a
practical alternative.

We appreciate very much this opportunity to make our views known and would hope that our comments be taken in a constructive manner and given due consideration and that appropriate exceptions and/or flexibility be given this Agency in the establishment and administration of parking fees.

Sincerely,

Don I. Wortman
Deputy Director
for
Administration

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